

State of Kansas

Bill Graves



Governor

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RCRA PERMITTING & COMPLIANCE BRANCH  
(R/CB)

Department of Health and Environment

James J. O'Connell, Secretary

December 2, 1996

Mr. Ronald K. Robertson  
Facility Environmental Manager  
Hydrocarbon Recyclers, Inc. of Wichita  
2549 North New York  
Wichita, KS 67219

RE: Closure of Drier Unit, Tank V-18, and Tank V-13  
Hydrocarbon Recyclers, Inc. of Wichita  
Wichita, KS  
EPA I.D. Number KSD007246846



R00041443

RCRA Records Center

Dear Mr. Robertson;

The department has completed its review of HRI's submittal as referenced above. The department concurs these changes warrant a Class 1 permit modification to HRI's TSD permit. Per our review, and subsequent site visit on November 20, 1996, the department has the following comments:

- The department views HRI's removal of tank V-13 as a replacement with an equivalent tank, not as a closure. If HRI chooses to complete a closure of tank V-13, the facility's permitted storage will be reduced by 5,078 gallons. From the department's site visit as referenced above, our conversation confirmed HRI wishes to complete a replacement for tank V-13 with an equivalent tank. HRI has appropriately referenced Section J-4a (2) (a) in their Part B to complete the decontamination of tank V-13. The department will note that tank V-13 will be decontaminated and left in place until HRI replaces the tank. The department finds the decontamination schedule submitted by HRI to be acceptable.
- HRI has requested that section D100 be removed from the requirements of Subpart J of 40 CFR 264 due to the removal of the drier and its associated tank V-18. The department will approve section D100's release from 40 CFR 264 Subpart J requirements after HRI submits notice that a certification of partial closure for the drier area has been completed. The department considers the decontamination of the drier unit to include the deck and walls located within the immediate area. HRI shall meet the requirements of 40 CFR 264.114 applicable to the removal of the drier unit. HRI should define the specific decontamination area pertinent with the removal of the drier unit. Section D100 will then be subject to the requirements of Subpart I of 40 CFR 264 due to the continued use of the area for the containerized waste storage.
- The department requests HRI submit an updated Part A application to reflect the closure of the drier unit, and removal of tank V-18. EPA Form 8700-23 with the revision date of 2/28/95 is enclosed.
- Revised table E.2 included with HRI's September, 1996, submittal shows a deletion of 152 fifty-five gallon containers in area D100 in building D. Per our site visit and discussion of this issue, HRI stated this deletion was made in error. Please correct.

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- The department concurs with HRI that the necessity for the impermeable coating as required under subpart J of 40 CFR 264, will no longer be applicable to section D100 after the removal of the drier.

All revised pages submitted should contain a **highlight/strikeout** copy along with a clean copy for insertion into the Part B. Should you have any questions, please do not hesitate to contact me at the number listed below.

Sincerely,

*David E. Cox*

David E. Cox  
Bureau of Waste Management  
Hazardous Waste Permit Section

enclosure

cc      Wes Bartley - USEPA Region VII, RCRA Branch  
         Mark Bradbury - DEA/SCDO/Waste Programs → Teresa Hansen